

# **Exhibit 4**

# epiq reliability

Epiq Class Action and Claims Solutions CV



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**Epiq is a leading class action settlement administrator delivering best-in-class people, technology and service for class action administration matters anywhere in the world—regardless of size or complexity.**

### **History:**

Epiq has been administering settlements since 1993, including settlements of class actions, mass tort litigations, Securities and Exchange Commission enforcement actions, Federal Trade Commission disgorgement actions, insurance disputes, bankruptcies, and other major litigation. Epiq has administered thousands of settlements, including some of the largest and most complex cases ever settled.

Epiq's class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment and implementation of notice fulfillment services, coordination with the United States Postal Service ("USPS"), electronic noticing, notice website development and maintenance, dedicated phone lines with recorded information and/or live operators, receipt and processing of opt-outs, claims database management, claim adjudication (paper and electronic), funds management, and award calculations and distribution services (both traditional checks and electronic payments). Epiq works with the settling parties, the Court, and the Class Members in a neutral facilitation role to implement administration services based on the negotiated terms of a settlement.

Through Hilsoft Notifications, our global provider of legal noticing services, we provide superior notice plan design, implementation, oversight, and communications for class action, mass tort, and bankruptcy proceedings. Hilsoft Notifications has been retained by defendants and/or plaintiffs on more than 300 cases, including more than 30 MDL cases, with notices appearing in more than 53 languages and in almost every country, territory and dependency in the world.

Epiq also has a Mass Tort division, which offers claimant communication support, medical record retrieval and review, plaintiff fact sheet fulfillment, settlement document fulfillment, lien resolution and fund administration and payments.

### **Strategically located:**

- 12 dedicated offices providing project management and operational support including, New York City, New York; Beaverton, Oregon; Lake Success, New York; Dublin, Ohio; Seattle, Washington; Tampa, Florida; Phoenix, Arizona; Tallahassee, Florida, London UK, Memphis TN and Ottawa and Waterloo, Ontario.
- 3 state-of-the-art full-service mail, print, and contact centers in Beaverton, Oregon, Memphis, TN and Dublin, Ohio.
- 2,670 contact center seats across all locations.



**Epiq has been retained on some of the highest profile cases in history:**

*In re: Payment Card Interchange Fee and Merchant Discount Antitrust Litigation* This \$6B+ settlement is one of the largest antitrust class action settlements of all time. Epiq received roughly 80 billion rows of data with 163 types of data columns in 180 distinct files. The aggregated data set is over 110 terabytes and is hosted in a PCI-compliant environment. Over a five-month period this data was used to generate 21 million settlement notice mailings. This settlement is currently on appeal and therefore the claims process has not yet begun. However, in order to efficiently handle the anticipated claim volume, we implemented a pre-registration process that allows merchants to provide information to expedite the claims process prior to claim filing.

*In re: Oil Spill by the Rig "Deepwater Horizon"* Prior to settlement, Epiq acted as a shared database manager for the litigation, collecting data from plaintiffs' counsel, defense counsel, the Gulf Coast Claims Facility, and the court to create an aggregated system of record to manage all plaintiff data. Responsibilities included data intake and processing of all new forms filed on PACER and LexisNexis File & ServeXpress, loading partially complete data lists, identifying exceptions and mismatches and resolving missing data, duplicates and incorrect information for the parties. Epiq's legal noticing division, Hilsoft Notifications, was then appointed as the notice administrator for both the \$7.8 billion economic damages and medical benefits settlements. Across a condensed six week period, Hilsoft ran notices nationally and locally in more than 2,000 print publications. Approximately 10,000 television and radio spots aired across 26 media markets stretching from Houston to Miami. In addition to English, notices appeared in Spanish and Vietnamese. It is estimated that more than 95% of all adults living in the Gulf Area and more than 83% of all adults in the United States had an opportunity to see the notice. In total, the notice effort was one of the largest ever undertaken in a class action settlement.

*In re: Takata Airbag Products Liability Litigation* Massive individual notice mailing to over 59 million class members with Toyota, Mazda, Subaru, BMW, Honda, Nissan and Ford vehicles, as part of \$1.49 billion in multiple settlements regarding Takata airbags. Comprehensive nationwide media accompanied each phase, comprised of radio ads, consumer magazine ads and extensive online notice.

*In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Product Liability Litigation (Bosch Settlement)* Comprehensive notice program within the Volkswagen Emissions Litigation that provided individual notice to more than 946,000 vehicle owners via first class mail and to more than 855,000 via email. A targeted internet campaign further enhanced the notice effort.

*Hale v. State Farm Mutual Automobile Insurance Company* For a \$250 million settlement with approximately 4.7 million class members, Epiq designed and implemented a Notice Program with individual notice via postcard or email to approximately 1.43 million class members and a robust publication program, which combined, reached approximately 80% of all U.S. Adults Aged 35+ approximately 2.4 times each.

*Oppenheimer Rochester Group Funds Securities Litigation* In these securities cases, which combine six separate settlements, Epiq reviewed and processed over 10 million trade transactions, consolidated data and mailed more than 450,000 pre-populated records of claimant transactions ("ROFTS") to alleviate the burden on the majority of class members to research and file claims, and mailed over 180,000 additional Claim Forms and notices. We created complex software code to calculate the recognized losses across 19 different types of securities.

*In re Merck & Co., Inc. Securities, Derivative & "ERISA" Litigation ('Vioxx')* Epiq is currently administering this \$1.062 billion settlement involving damages from securities trades going as far back as 1999. Epiq mailed almost 2 million notices, received more than 400,000 claims and processed millions of lines of securities transaction data, determined losses using complex algorithms relating to multiple securities for injured investors.



*Hooker v SiriusXM Radio Inc.* This \$35 million settlement for alleged TCPA violations involves approximately 12 million class members. Class members could register for three months of free service or file a claim for cash payment. Epiq's class member outreach included both mailing approximately 8 million postcards and a total of 50 million emails to class members for noticing and reminder purposes. The claims administration process involved working with the defendant to validate claims data using the defendant's internal database.

*The Shane Group, Inc. v Blue Cross Blue Shield of Michigan* Epiq is the claims administrator for this 3 million class member insurance anti-trust settlement. Epiq utilized its proprietary Third-Party Payor (TPP) database to notice insurance companies and other third party payors in addition to the individual class members provided by the defendant. The claims process was complex and involved sensitive HIPAA protected data that had to be housed in a custom secure environment. The settlement was appealed and as a result the parties are currently finalizing alterations to the settlement to address the concerns of the appellant.

*In re Checking Account Overdraft Litigation* Epiq has implemented more In re: Checking Account Overdraft MDL NO. 2036 overdraft class action settlements than any other administrator and is currently providing settlement services to five of the six largest U.S. banks. Our ability to securely intake and normalize complex data from a multitude of sources proves a natural fit for banks and other financial services firms.

*Mortgage Servicing Regulatory Settlement Summary* Epiq is currently handling a number of remediation and distribution programs involving various financial institutions pursuant to private settlements and consent orders with the OCC, DOJ, FRB and CFPB. Examples of these engagements include:

- A borrower identification and distribution program to support a \$35 million Department of Justice (DOJ) and Consumer Financial Protection Bureau (CFPB) settlement with a financial institution related to mortgage loans made to African-American and Hispanic borrowers.
- A payment distribution program to support an expedited payment agreement between the Office of the Comptroller of the Currency (OCC) and a financial institution, which resolves an Independent Foreclosure Review of the financial institution's foreclosure practices.
- A notification, claims and distribution program to support a Federal Reserve settlement with a financial institution related to mortgage loans originated at more than 800 branch offices.
- A notification, claims and distribution program to support a \$320 million Home Affordable Modification Program (HAMP) settlement between the DOJ and a financial institution.



## Experience in major projects by dollar value (values have been rounded)

<b>\$44.5B</b>	Lehman Brothers Holding Inc	<b>\$1.9B</b>	1983 Marine Barrack's Bombings	<b>\$480M</b>	Wells Fargo Securities Litigation
<b>\$11B</b>	Deepwater Horizon Economic Settlement	<b>\$1.3B</b>	Hispanic Women and Farmers	<b>\$473M</b>	Schering Securities Litigation
<b>\$8.5B</b>	BNY Mellon Countrywide RMBS	<b>\$1B</b>	In re Merck & Co Inc. Securities Derivative & ERISA Litigation	<b>\$389M</b>	Royal Dutch Shell
<b>\$6.15B</b>	WorldCom Securities	<b>\$860M</b>	Johnson & Johnson Acuvue	<b>\$384M</b>	Wells Fargo CPI
<b>\$5.5B</b>	In Re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation	<b>\$853M</b>	Air Cargo Antitrust	<b>\$328M</b>	In re Volkswagen "Clean Diesel" (Bosch Settlement)
<b>\$4.6B</b>	Indian Residential Schools Settlement	<b>\$850M</b>	Marsh & McLennan	<b>\$325M</b>	Precision v. PWT ('Freight Forwarders')
<b>\$4.5B</b>	Bank of America Auction Rate Securities	<b>\$845M</b>	In re Urethane Antitrust	<b>\$320M</b>	SunTrust HAMP
<b>\$4.5B</b>	JP Morgan Chase RMBS	<b>\$834M</b>	Tremont Securities	<b>\$299M</b>	Takata Ford
<b>\$3.4B</b>	Indian Trust	<b>\$800M</b>	Engle Trust Fund	<b>\$231M</b>	US Embassy Bombings
<b>\$3.2B</b>	Tyco Securities	<b>\$758M</b>	In re Hyundai and Kia Engine Litigation	<b>\$228M</b>	Hall v Bank of America
<b>\$3.05B</b>	VisaCheck/Mastermoney Antitrust	<b>\$750M</b>	Washington Public Power Supply Systems	<b>\$219M</b>	Genworth Securities Litigation
<b>\$3B</b>	Petrobras Securities Litigation	<b>\$750M</b>	Bristol Myers Securities	<b>\$215M</b>	Merck Securities Litigation
<b>\$2.6B</b>	Morgan Stanley RMBS	<b>\$730M</b>	United States v. Pokerstars	<b>\$212M</b>	Wells Fargo Financial Consent Order
<b>\$2.43B</b>	Bank of America Corp. Securities Derivative & ERISA	<b>\$590M</b>	Klein, et al. v. Bain Capital Partners LLC, et al.	<b>\$210M</b>	In re Wilmington Trust Securities Litigation
<b>\$2.1B</b>	The Hepatitis C Tainted Blood Transfusion Settlements	<b>\$520M</b>	Jessica S. Cook v. Santee Cooper et al	<b>\$210M</b>	Salix Securities Litigation
<b>\$2B</b>	In re Foreign Exchange Benchmark Rates Antitrust Litigation	<b>\$504M</b>	ISDAfix Antitrust Settlement	<b>\$200M</b>	In re Fresenius Granuflo/Naturalyte Dialysate Products Liability Litigation
<b>\$1.2B</b>	Black Farmers Discrimination Litigation	<b>\$504M</b>	Bank of NY Mellon Forex	<b>\$200M</b>	In re New England Compounding Pharmacy Inc. Products Liability Litigation
<b>\$1.10B</b>	Royal Ahold Securities	<b>\$480M</b>	Gary Heffler, et al. v. Wells Fargo & Co. et al.	<b>\$200M</b>	NECC Victims Compensation Program





## By notices disseminated (values have been rounded)

116,000,000	Ticketmaster.com	11,000,000	Premiera Data Breach Settlement	4,600,000	1-800-Flowers Retail
57,000,000	Classmates.com	9,000,000	Pelayo v. Mexico Money Transfer	4,500,000	Progressive Group Auto Insurance
55,000,000	Hooker v Sirius XM Radio	9,000,000	Farrell v Bank of America	4,300,000	Chimeno-Buzzi v Hollister
53,000,000	Takata Settlement	9,000,000	Precision v PWT	4,100,000	Amex Merchant Settlement
32,000,000	Justice Stores-McGladrey	8,400,000	Air Passenger Settlement	4,000,000	WorldCom Securities
26,000,000	VisaCheck/MasterMoney Antitrust	8,300,000	Takata Ford	3,900,000	Scharfstein v BP WCP
25,000,000	IPO Securities	8,300,000	Marolda v Symantec	3,800,000	Clark v TransUnion
22,000,000	McKnight v Uber	8,300,000	Bank of America TCPA	3,700,000	Fifth Third Overdraft Settlement
21,000,000	Interchange	8,000,000	Meckstroth v Toyota Motor	3,700,000	Tennille v Western Union
20,500,000	Nwabueza v. AT&T	7,600,000	Vergara v. Uber TCPA Settlement	3,600,000	Bodnar v BofA
20,000,000	Webloyalty.com, Inc.	7,600,000	MFS Sub-Track Mutual Fund	3,500,000	Pfizer Securities Litigation
19,000,000	Interchange	7,100,000	TD Bank Debit Card Overdraft	3,500,000	IDE - UCLA Health
18,000,000	Western Union Money Transfer	7,000,000	Community Hlth Sys DB	3,500,000	Bosch Settlement
16,000,000	Khoday v. Symantec	7,000,000	Time Warner Entertainment Company	3,500,000	Wells Fargo CPI Class Action
15,140,000	Experian Information Solutions, Inc.	7,000,000	AT&T Wireless	3,500,000	Michael Kors Administration
15,000,000	Farag v Kiip	7,000,000	Equifax Consumer Services, Inc.	3,400,000	Lucero v SolarCity TCPA Settlement
15,000,000	Browning v. Yahoo!	6,400,000	UCLA Health Data Breach Settlement	3,300,000	Snyder v Ocwen Loan Servicing
15,000,000	JP Morgan TCPA	6,400,000	Angies List	3,200,000	Hale v. State Farm
14,000,000	Living Social	5,700,000	Moore v Verizon	3,000,000	McKinney-Drobnis v Massage Envy
14,000,000	Sallie Mae	5,000,000	Mohan v. Dell	3,000,000	Amgen Securities Litigation
13,000,000	Expedia Hotel Taxes and Fees	5,000,000	Moneygram – Mexico Money Transfer		



## By claims processed (values have been rounded)

<b>4,300,000</b>	Lease Oil Antitrust	<b>670,000</b>	Citigroup Inc. Securities	<b>298,000</b>	Snyder v Ocwen Loan Servicing
<b>2,100,000</b>	Strong Sub-Track Mutual Fund	<b>618,000</b>	TransUnion	<b>275,000</b>	TD Bank Debit Card Overdraft
<b>1,960,000</b>	Wolf v. Red Bull	<b>607,000</b>	Justice Stores-McGladrey	<b>268,000</b>	Merck Securities Litigation
<b>1,200,000</b>	Baby Products Antitrust	<b>601,000</b>	Dell Fair Fund	<b>264,000</b>	Carnegie v HR Block
<b>1,051,000</b>	Takata Settlement	<b>600,000</b>	Global Crossing Securities	<b>256,000</b>	Mohan v. Dell
<b>1,000,000</b>	AMEX Financial Advisors Securities	<b>521,000</b>	Expedia Hotel Taxes and Fees	<b>250,000</b>	Hill v State Street
<b>995,000</b>	Daniels v. Allstate	<b>520,000</b>	SEC v AIG	<b>240,000</b>	Toronto-Dominion Securities Litigation Settlement
<b>980,000</b>	WorldCom Securities	<b>500,000</b>	Nortel Networks (I & II) Securities	<b>236,000</b>	Bank of America TCPA
<b>950,000</b>	Gulf Coast Claims Facility	<b>438,000</b>	General Motors Securities Litigation	<b>231,000</b>	Apple Securities Litigation
<b>880,000</b>	Premiera Data Breach Settlement	<b>425,000</b>	Amgen Securities Litigation	<b>227,000</b>	Purex Settlement
<b>815,000</b>	Progressive Fair Credit Reporting Act	<b>414,000</b>	Merck Vioxx Securities Litigation	<b>206,000</b>	Trombley v National City
<b>815,000</b>	VisaCheck/MasterMoney Antitrust	<b>396,000</b>	Zepeda v. PayPal	<b>196,000</b>	Marchese v Cablevision
<b>760,000</b>	Oppenheimer Funds Securities	<b>394,000</b>	Moore v Verizon	<b>195,000</b>	Toyota Securities Litigation
<b>724,000</b>	Wells Fargo Securities	<b>389,000</b>	Reynolds v Hartford	<b>194,000</b>	SEC v Raytheon
<b>719,000</b>	Bank of America Corp. Securities Derivative & ERISA	<b>357,000</b>	BNYM Forex Securities Litigation	<b>182,000</b>	Ridgely v FEMA
<b>700,000</b>	Lucent Technologies, Inc. Securities	<b>325,000</b>	Hooker v Sirius XM Radio	<b>179,000</b>	Royal Dutch Shell
<b>698,000</b>	Classmates.com	<b>324,000</b>	Air Passenger Settlement	<b>178,000</b>	Angies List
<b>685,000</b>	Deloris Kline v. Progressive Corporation	<b>313,000</b>	Cerbo v Ford of Englewood, Inc.	<b>148,000</b>	UCLA Health Data Breach Settlement
<b>672,000</b>	Oppenheimer Rochester Fund Securities Litigation	<b>303,000</b>	Wright et al v Nationstar Mort	<b>144,000</b>	Tennille v Western Union